

# EXHIBIT A

Also, my attorney works on a contingency. Meaning that he gets paid what he collects. YOU? You'll spend \$30-50K on attorneys, then you'll lose. And then you'll pay us.

Nice to know the online scammer has a scam lawyer

If you are so foolish to actually sue me, we'll recover the court costs as part of the settlement to make you go away

So roll the dice, tough guy.

You're the one suing bud

And by your last statement, you have no idea how court works, do you?

The court will order me restitution for your abusive behaviors and demonstrative past abuse of the court system

Although, blood from a stone will be difficult, we'll simply garner future wages

\*garnish

LOL!!! You're hilarious. My attorney has been rated one of Virginia's top 100 attorneys for the past 11 years. So goooooood luck.

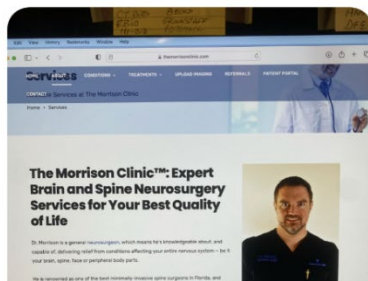
What was your Yelp search you used to find him?

Also, court will be here in Virginia. So add the extra travel expenses to that.

Surely you understand I wouldn't have to appear in person, and my attorneys would make an appearance on my behalf?

Actually no, you would have to appear for court.

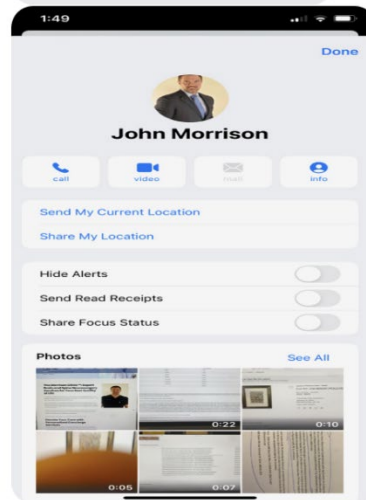
Clearly you haven't gone to court..



Is that you? You're a doctor?

Cha-Ching!!!

That IS you!!! That's awesome!



Last warning.....if you file a chargeback, you're definitely getting sued.

you had my information from the sale bud. You seem to lack simple one step processing

LOL!!! Are trying to make me laugh.....it's working. But I'm laughing at you, not with you.

And normally I'd have to do an asset search prior to filing a lawsuit, but not this Tim!!!

Again, you amaze me with your lack of understanding of the things you say

Note, you do not refute that you are a criminal and scamming people

I've personally files over 1000 lawsuits myself.....that doesn't count the suits that I had attorneys file for me. You're screwed.

You have a problem

If you say so. Right now, you don't have a problem. If you file that chargeback, I'll everything that I said that I'd do.

Are you threatening me?

With a lawsuit.....yes.

# EXHIBIT B

**VIRGINIA:**

**IN THE CIRCUIT COURT OF THE COUNTY OF HANOVER**  
**Civil Division**  
7350 County Complex Road  
Hanover, Virginia 23069

RECEIVED and/or FILED

**JUL 13 2023**

CLERK'S OFFICE  
HANOVER CIRCUIT COURT

**JOHN A. JUREIDINI,**  
**THE RUG LIFE, LLC**

Plaintiffs,

v.

Case No. CL23002484-00

**JOHN MORRISON**  
701 South Olive Avenue, No. 1605  
West Palm Beach, Florida 33401

Defendant

### **COMPLAINT**

Plaintiff, John A. Jureidini ("Jureidini") and The Rug Life, LLC ("Rug Life"), by counsel,  
set forth to the Court the following:

#### **Parties**

1. Jureidini is a natural person who resides in the Commonwealth of Virginia.
2. Rug Life is a Virginia limited liability company.
3. John Morrison ("Morrison") is a natural person who resides in the  
State of Florida.

#### **Venue**

4. Venue is proper in this Court because this complaint relates to an auction sale  
under terms and conditions including that any litigation relative to such auction  
must be in this Court.

**Facts**

5. Jureidini, at all times relevant to this complaint, has been vice-president, managing member, and part-owner of the Rug Life, LLC ("Rug Life"), a limited liability company doing business in the Commonwealth of Virginia of conducting on-line auctions of rugs, fine art, and rare book sets.
6. On January 31, 2023 Rug Life conducted an auction ("the January 2023 auction ") of hand knotted rugs, fine art, and rare book sets.
7. Prior to the January 2023 auction, Rug Life gave notice that purchasers at the auction could come to the Rug Life to pick up their items or could retain services to pick up anything purchased by purchasers at purchaser expense or could elect to pay a \$20 fee for packaging and delivery to one of several shippers.
8. The auction was conducted through Invaluable, LLC ("Invaluable") a national limited liability company for the conduct of on-line auctions.
9. The opportunity for those who conduct auctions through Invaluable has been and remains very valuable for those who utilize Invaluable's auction services. Loss of such opportunity, when such occurs, results in significant economic loss to any business conducting on-line auction services through Invaluable; if one loses such opportunity there are not any comparable platforms for those excluded from Invaluable's services. This is because Invaluable is much the largest online auction platform in the world.

10. Jureidini did most of the work for Rug Life for the January 2023 auction.
11. At the January 2023 auction, Morrison made the high bid to purchase a Jackson Pollock lithograph.
12. Morrison subsequently made a verbal complaint to Invaluable about Rug Life's \$20 charge (which, as cited herein above, was at purchaser option).
13. During that verbal complaint, Morrison named Jureidini.
14. Subsequently, on February 9, 2023, Morrison sent an email to Invaluable, which stated, in part, "I would like him removed from the marketplace." Such reference to "him" was a reference to Jureidini, which was known by Invaluable because Morrison made clear in his verbal complaint recited above that he was making a complaint about Rug Life based on Morrison's interactions with Jureidini.
15. The February 9, 2023 email included an intentionally false claim that Jureidini had "stalked" Morrison 'personally' and "' threatened" Morrison. Such email also included a statement that Jureidini "charges a shipping and handling fee, then has a friend or associate call to shake you down for further money."
16. The charge by Morrison against Jureidini recited in paragraph 15 of this complaint constituted a false charge of criminal actions by Jureidini against Morrison and therefore constituted libel *per se*.
17. All of the charges by Morrison against Jureidini recited herein above were intentionally false.

18. The charges against Rug Life recited herein above were intentionally false.

19. As a proximate result of the facts set forth herein above, Morrison is liable to Jureidini for defamation *per se* and a result of which Jureidini is presumed to have sustained damages for which Jureidini is entitled to recover. Jureidini's claim for a money judgment for such *per se* defamation has included but not been limited to damage for past emotional distress and future emotional distress which has included but not been limited to stress, loss of sleep, anger, loss of appetite; difficulty at work, fear of loss of business opportunity and loss of the normal enjoyments of daily life and will include all such damages in the future.

20. As a result of the facts recited herein above, as a proximate result of Morrison's *per se* defamation against Jureidini, the Rug Life and Jureidini have sustained damage and will sustain damage to their reputations with Invaluable.

21. The actions of Morrison recited herein above in this complaint were intentional, deliberate, willful, oppressive, and malicious with intent to harm Jureidini and Rug Life economically and with the intent to put Rug Life out of business.

22. As a result of the facts recited herein above, the Rug Life and Jureidini are entitled to entry of a judgment in their favor against Morrison for compensatory and punitive damages.

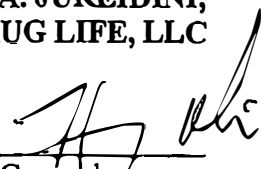
**Conclusion**

Wherefore, Jureidini and Rug Life pray that the Court enter a judgment in their favor against Morrison for \$150,000 compensatory damages and \$350,000 punitive damages.

Respectfully submitted,

**JOHN A. JUREIDINI,  
THE RUG LIFE, LLC**

By

  
Counsel

Henry W. McLaughlin (VSB No. 07105)  
Law Office of Henry McLaughlin, P.C.  
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Richmond, Virginia 23219  
(804) 205-9020; fax (877) 575-0245  
henry@mclaughlinvalaw.com  
*Counsel for John A. Jureidini*



# EXHIBIT C

COMMONWEALTH OF VIRGINIA



HANOVER CIRCUIT COURT  
Civil Division  
7530 COUNTY COMPLEX RD/PO BOX 39  
HANOVER VA  
(804) 365-6151

*E. H. BALASH*  
*CPS # PR C10*  
*9/20/23 6:05 PM*  
*[Signature]*

Summons

To: JOHN MORRISON  
701 SOUTH OLIVE AVE., NO. 1605  
WEST PALM BEACH FL 33401

Case No. 085CL23002484-00

The party upon whom this summons and the attached complaint are served is hereby notified that unless within 21 days after such service, response is made by filing in the clerk's office of this court a pleading in writing, in proper legal form, the allegations and charges may be taken as admitted and the court may enter an order, judgment, or decree against such party either by default or after hearing evidence.

Appearance in person is not required by this summons.

Done in the name of the Commonwealth of Virginia on, Friday, July 14, 2023

Clerk of Court: FRANK D. HARGROVE JR.

by *Haile P. Sheudan*  
(CLERK/DEPUTY CLERK)

Instructions:

Hearing Official:

Attorney's name: MCLAUGHLIN, HENRY W  
EIGHTH AND MAIN BUILDING  
707 EAST MAIN STREET, STE.1050  
RICHMOND VA 23219

# EXHIBIT D

## State Corporation Commission Clerk's Information System

### Entity Information

#### Entity Information

Entity Name:	The Rug Life LLC	Entity ID:	11235807
Entity Type:	Limited Liability Company	Entity Status:	<b>Active</b>
Series LLC:	No	Reason for Status:	Active
Formation Date:	11/13/2018	Status Date:	09/17/2023
VA Qualification Date:	06/02/2021	Period of Duration:	Perpetual
Industry Code:	0 - General	Annual Report Due Date:	N/A
Jurisdiction:	DE	Charter Fee:	N/A
Registration Fee Due Date:	Not Required		

#### Registered Agent Information

RA Type:	Individual	Locality:	HANOVER COUNTY
RA Qualification:	Member or Manager of the Limited Liability Company		
Name:	John A Jureidini	Registered Office Address:	10295 Summer Hill Rd, Mechanicsville, VA, 23116 - 6611, USA

#### Principal Office Address

Address: 10295 Summer Hill Rd,  
Mechanicsville, VA, 23116 - 6611,  
USA

[Filing History](#)[RA History](#)[Name History](#)[Previous Registrations](#)[Protected Series](#)[Garnishment Designees](#)[Image Request](#)[Back](#)[Return to Search](#)[Return to Results](#)[Back to Login](#)



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## The Rug Life

P.O. Box 797  
Richmond  
VA 23218-0797

**908 875 5603**

[john@rug-auction.com](mailto:john@rug-auction.com)



## Contact Us

\*Required Fields.

Name\*

Email\*

Phone Number

Country

Message\*

SUBMIT



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